



Internet Telephony Services Providers' Association

ITSPA response to Ofcom Consultation on 'Promoting efficient use of geographic telephone numbers'

About ITSPA

The Internet Telephony Services Providers' Association (ITSPA) represents over 90 UK businesses involved with the supply of next generation communication services over data networks to industry and residential customers within the UK. Our traditional core members are VoIP providers. ITSPA pays close attention to both market and regulatory framework developments on a worldwide basis in order to ensure that the UK internet telephony industry is as competitive as it can be within both national and international markets.

A full list of ITSPA members can be found at <http://www.itspa.org.uk/>

Response

ITSPA welcomes the opportunity to respond to the consultation on efficient use of geographic numbers, published on 28th October 2016.

ITSPA acknowledges that Ofcom's statement in its consultation document that the increase in the number of communications providers has resulted in greater demands on its inventory of telephone number does hold a degree of truth. However, there are two significant issues we would like to raise in this area.

Whilst we accept that the introduction of charges has had some influence on number returns and reduced subsequent uptake, we believe an equally significant factor is likely to be the introduction of smaller number blocks and the recovery of large unused portions of numbers blocks by Ofcom that took place around the same time. For many networks this was the first opportunity they had to rationalise this number pool and make more efficient use of their number allocations.

Additionally, as Ofcom is already aware, BT's policy as range holder is not to split individual numbers from DDI number blocks, resulting in a range of problems for communications providers and their consumers. Not only does the refusal to split numbers from DDI blocks cause harm to end user customers and stifle competition, it also is an inefficient use of the numbers inventory.

The current system, due in part to the fact that BT primarily operates in an analogue state, means that if a customer requires a main number with ten extensions, this will require an additional ten lines from BT to provide a service across each line, although this is not necessary in an IP world. When it comes to a port of the main number, the block of ten numbers would have to be ported alongside the main one, despite the customer having no use for these. A much more efficient system would see just the main number being ported, with the ten other numbers being returned to the original range holder. Some of our members have seen cases where hundreds of numbers have been tied into a block, and have therefore had to be ported, despite the customer wishing for just one number to be ported.



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Ofcom is aware that the Office of the Telecoms Adjudicator (OTA) is currently working to facilitate a solution which would allow numbers to be split. However, due to a lack of investment from BT in its legacy network, it is likely that the solution will be a limited workaround.

ITSPA would encourage Ofcom to monitor the current series of OTA workshops on the issue to ensure that a satisfactory solution is reached, which meets the needs of customers and allows the telephone number inventory to be used more efficiently.

The problem outlined above provides just one example of the myriad of issues in the number portability regime which impact Ofcom's number conservation. ITSPA has been in contact with the Digital Communications Review team on this issue and would be happy to liaise with the team further if required.